

## **Remarks**

Upon entry of the foregoing Amendment, claims 1-12 are pending in this application. No claims are amended, canceled or added. In view of following Remarks, allowance of the pending claims is requested.

### ***Objections to the Specification***

The Examiner has objected to the specification for incorrectly stating the title of the provisional application from which the application claims priority. Applicant has amended the specification to correct this informality.

### ***Rejections Under 35 U.S.C. § 103***

The Examiner has rejected claims 1-12 under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 5,490,061 to Tolin *et al* ("Tolin") in view of U.S. Patent No. 5,991,713 to Unger *et al*. ("Unger"). Applicant traverses this rejection because the references, either alone or in combination with one another, do not disclose, teach or suggest all the features of the claimed invention.

In particular, one of ordinary skill in the art would not have arrived at the claimed invention based on the combination of teachings of Tolin with Unger. Unger pertains to a compression mechanism described as:

A method for compressing text includes steps of parsing words from text in an input file and comparing the parsed words to a predetermined dictionary. The dictionary has a plurality of vocabulary words in it and numbers or tokens corresponding to each vocabulary word. A further step is determining which of the parsed words are not present in the predetermined dictionary and creating at least one supplemental dictionary including the parsed words that are not present in the predetermined dictionary. The predetermined dictionary and the supplemental dictionary are stored together in a compressed file. Also, the parsed words are replaced with numbers or tokens corresponding to the numbers assigned in the predetermined and supplemental dictionary and the numbers or tokens are stored in the compressed file.

Unger at Abstract.

Unger further states that:

Fig. 9 shows a typical natural language dictionary file 400 that includes a header 420 and three token ranges. The most frequently occurring words within the natural language are assigned a token with the Ultra-High Frequency ("UHF") token range 440. The next most frequent words are similarly assigned values in the High Frequency ("HF") token range 460, and the least frequent words are assigned value in the Low-Frequency ("LF") token range 480. Most of the words in a particular natural language are considered very infrequent (called very low frequency or VLF vocabulary) and are not included in the predetermined dictionary for that particular natural language.

Unger at column 9, lines 14-25. Thus, according to Unger, the predetermined dictionary does not represent all the words in the second language. In fact, the predetermined dictionary would not include *most of the words in the second language*. Instead, Unger relies on the supplemental dictionary for words not in the predetermined dictionary. See Unger at column 10, lines 6-8. The supplemental dictionary is built from the document itself based on words in the document that do not appear in the predetermined dictionary.

Thus, Unger is limited to applications where words in a document are converted into numbers or tokens based on a predetermined dictionary and a supplemental dictionary. Absent these two dictionaries, Unger is unable to convert the numbers or tokens back into words.

In contrast, claim 1, for example, recites "converting the numeric representation of the corresponding content expressed in the second language into the corresponding content expressed in the second language." However, the combined teachings of Tolin and Unger could not accomplish at least this feature of the claimed invention for at least the reason that no supplemental dictionary would or could exist to convert the numbers or tokens back into words in the second language. Such a supplemental dictionary would require knowledge of the representation of the content expressed in the second language prior to the conversion itself, which is logically impossible. In the absence of a supplemental dictionary, the predetermined dictionary would have to include all the words of the second language which is clearly contrary to the teachings of Unger. For at least these reasons, the combination of the Tolin and Unger fail to teach or suggest

all the features of the claimed invention. Accordingly, the rejection is improper and must be withdrawn.

Claim 9 recites a features similar to that discussed above with regard to claim 1. For at least the reasons set forth above with regard to claim 1, the rejection of claim 9 is improper and must be withdrawn. Claims 2-8 depend from and add features to claim 1 and claims 10-12 depend from and add features to claim 9. The rejections of these dependant claims are likewise improper for at least the reasons set forth above with respect to claim 1 and must be withdrawn.

### ***Conclusion***

A full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,



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